

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO**

UNITED STATES OF AMERICA	)	JUDGE: SOLOMON OLIVER
	)	
Plaintiff,	)	CASE NO.: 1:19 CR 493
-vs-	)	
	)	
NATHAN BAEZA	)	<b>MOTION FOR</b>
	)	<b>RELEASE</b>
Defendant	)	

Now comes the Defendant, Nathan Baeza, by and through his attorney, James J. McDonnell, and respectfully requests that this Honorable Court release him on a personal bond until his sentencing, which is set for May 12, 2020. The reason for this request is Covid 19. A review of the presentence report, paragraph 42, outlines the defendant's physical condition. In 2009 the defendant was diagnosed with testicular cancer and received chemotherapy. Additionally, the defendant was diagnosed in 2014 with a serious medical condition, HIV, which affects the ability to combat infections. Defendant is incarcerated at the Mahoning County Jail. He is housed on the sixth floor in a pod with 40 plus inmates. They are all within six feet of each other.

Respectfully submitted,

/s/ James J. McDonnell

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**Certificate of Service**

I herby certify that a true copy of the forgoing motion was filed electronically on April 7, 2020. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/s/ James J. McDonnell

JAMES J. MCDONNELL (0005802)

Counsel for Defendant